## IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

LARRY SAMMS
Plaintiff
SCase No.: 1:15-CV-02741-JSR
V.
SABRAMS, FENSTERMAN,
FENSTERMAN, FORMATO,
FERRARA & WOLF, LLP

## PLAINTIFF'S NOTICE OF MOTION TO FILE UNDER SEAL DOCUMENTS SUBJECT TO PROTECTIVE ORDER

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Plaintiff
Larry Samms will move this Court before United States District Judge Jed S. Rakoff, located at
the United States District Court, Southern District of New York, 500 Pearl Street, New York,
New York 10007-1312, at a time to be determined by the Court, for an Order granting Plaintiff's
aforesaid motion.

Dated: Brooklyn, NY

<u>June 8, 2016</u>
/s/

Ahmad Keshavarz

**Defendant** 

Respectfully submitted,

Ahmad Keshavarz
ATTORNEY FOR PLAINTIFF
The Law Office of Ahmad Keshavarz
16 Court St., 26<sup>th</sup> Floor
Brooklyn, NY 11241-1026
Phone: (718) 522-7900

Phone: (718) 522-7900 Fax: (877) 496-7809

Email: ahmad@NewYorkConsumerAttorney.com

## **CERTIFICATE OF SERVICE**

I hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Anthony Joseph Genovesi, Jr., Esq.

Abrams, Fensterman, Fensterman, Eisman, Formato, Ferrara & Wolf, LLP 1111 Marcus Avenue, Suite 107 Lake Success, NY 11042 Fax: (516) 328-6638

Email: agenovesi@abramslaw.com

Date: June 8, 2016 Brooklyn, NY

/s/

Ahmad Keshavarz Plaintiff's Attorney